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Attorneys for Defendants:

STATE OF NEVADA, ex rel. its BOARD OF MEDICAL EXAMINERS,

PAMELA CASTAGNOLA, KIM FRIEDMAN,

KATI PAYTON, TODD RICH and EDWARD COUSINEAU

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LARA WARD, an individual,

Plaintiff,

vs.

STATE OF NEVADA, ex rel. its BOARD  
OF MEDICAL EXAMINERS, DON  
ANDREAS, an Individual, PAMELA  
CASTAGNOLA, an Individual, KIM  
FRIEDMAN, an Individual, KATI  
PAYTON, an Individual, TODD RICH, an  
Individual, AND EDWARD COUSINEAU,  
an Individual; DOES I - X,

Defendants.

**Case No.:** 2:17-cv-03029-JAD-NJK

**STIPULATION AND  
ORDER REGARDING STAY PENDING  
DISMISSAL**

**Complaint Filed:** December 11, 2017

**Trial Date:** None set

Plaintiff, LARA WARD ("Plaintiff") and Defendants, STATE OF NEVADA, ex rel. its  
BOARD OF MEDICAL EXAMINERS, PAMELA CASTAGNOLA, KIM FRIEDMAN, KATI  
PAYTON, DON ANDREAS, and EDWARD COUSINEAU ("Defendants") (jointly the "P  
arties") by and through their respective attorneys of record, hereby stipulate and agree as  
follows:

1 WHEREAS, the Parties attended an Early Neutral Evaluation session on March 30, 2018  
2 before the Honorable Peggy A. Leen, United States Magistrate Judge and reached the terms of an  
3 agreement that would resolve the instant action in its entirety, which terms are generally  
4 described in a minute order issued by Judge Leen at ECF No. 46, including an agreement that  
5 Plaintiff shall continue receiving her salary and health benefits through and including June 1,  
6 2018;

7 WHEREAS, the Parties are in the process of preparing a long-form Settlement  
8 Agreement and Release and desire to avoid expenditure of additional time and resources pending  
9 the drafting and execution of the Settlement Agreement in light of the pending deadlines in the  
10 action;

11 THEREFORE, the Parties hereby stipulate and respectfully request that the Court enter  
12 an order that the case is STAYED in its entirety, including but not limited to all deadlines related  
13 to pleadings, responses to pleadings and any and all deadlines set forth within the Stipulated  
14 Discovery Plan at ECF No. 34, through and including June 30, 2018, by which time the Parties  
15 anticipate that all preconditions and requirements for Plaintiff to submit a stipulated dismissal  
16 with prejudice will have been performed by the Parties.

17  
18 **Date:** April 6, 2018

SUTTON HAGUE LAW CORPORATION, P.C.

19  
20 By: /s/ Jared Hague  
21 S. BRETT SUTTON  
22 JARED HAGUE  
23 ANTHONY E. GUZMAN II  
24 Attorneys for Defendants  
25 STATE OF NV BOARD OF MEDICAL  
26 EXAMINERS, PAMELA CASTAGNOLA,  
27 KIM FRIEDMAN,  
28 KATI PAYTON, and EDWARD  
COUSINEAU

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**Date:** April 6, 2018

GARG GOLDEN LAW FIRM

By: /s/ Anthony Golden  
ANTHONY GOLDEN  
Attorneys for Defendants  
DON ANDREAS

**Date:** April 6, 2018

HKM EMPLOYMENT ATTORNEYS, LLP

By: /s/ Jenny L. Foley  
JENNY L. FOLEY  
Attorney for Plaintiff  
LARA WARD

**ORDER**

GOOD CAUSE APPEARING, it is hereby ORDERED, ADJUDGED, AND DECREED that the case is STAYED in its entirety, including but not limited to all deadlines related to pleadings, responses to pleadings and any and all deadlines set forth within the Stipulated Discovery Plan at ECF No. 34, through and including June 30, 2018.

**IT IS SO ORDERED.**

Dated: April 9, 2018.



UNITED STATES DISTRICT JUDGE